

UNITED STATES OF AMERICA

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MINERALS MANAGEMENT SERVICE

OCS ALTERNATIVE ENERGY AND ALTERNATE USE

DRAFT PROGRAMMATIC EIS

+ + + + +

PUBLIC HEARING

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MONDAY, APRIL 16, 2007

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The meeting came to order at 10:00 a.m. in the main auditorium of the Main Interior Building, 1849 C Street, NW, Washington, DC. John Gasper, Moderator, Presiding.

PRESENT:

JOHN GASPER	MODERATOR
MAUREEN BORNHOLDT	MINERALS MANAGEMENT SERVICE
MARY BOATMAN	MINERALS MANAGEMENT SERVICE
WILL WASKES	MINERALS MANAGEMENT SERVICE

ALSO PRESENT:

SANDRA YOUNG	ALLIANCE TO PROTECT NANTUCKET SOUND
MAX CHAMOVITZ	OREC
ZACH CORRIGAN	FOOD AND WATER WATCH

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P-R-O-C-E-E-D-I-N-G-S

10:03 a.m.

MR. GASPER: Well welcome, everyone. I'd like to welcome you to the first public hearing for the Outer Continental Shelf Alternative Energy and Alternate Use Programmatic EIS. This kicks off the first of I think eight different public hearings around the country. And you're the very first to hear to speak, and get an opportunity to talk. So thanks for coming.

My name is John Gasper. I'm with Argonne National Laboratory. We're the folks who are supporting MMS in preparation of this programmatic EIS. And we're here to take your comments and make sure they're reflected in the final EIS.

At this point in time, I'd like to introduce Maureen Bornholdt, who's the program manager for the Alternative Energy and Alternate Use Program at the Minerals Management Service. She'll give a brief presentation. And then after that, we'll open the floor for comments.

Maureen?

MS. BORNHOLDT: Good morning and welcome.

I think you all need to move down a little bit. You're not exactly filling up this space. Come

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1 on. Move down. Make this a nice chat with regard to
2 the programmatic EIS.

3 As John said, my name is Maureen
4 Bornholdt, and I'm the program manager for the
5 Minerals Management Service's program on OCS
6 Alternative Energy and Alternate Use.

7 Well, who is MMS? MMS manages the ocean
8 energy resources and mineral resources on the outer
9 continental shelf, and federal and Indian mineral
10 revenues to enhance public trust and benefit and
11 promote responsible use and realize fair value.

12 The Minerals Management Service is
13 responsible for approximately two billion acres on the
14 federal outer continental shelf. Our jurisdiction
15 begins classically from about three miles from shore,
16 except in Texas and Florida in the Gulf of Mexico,
17 where it's about nine nautical miles from shore.

18 We minister and manage about 8,500 leases.
19 And we contribute to the national Treasury about \$8
20 billion a year.

21 But we're not here to talk about offshore
22 oil and gas. We're here to talk about our new
23 responsibilities under the Energy Policy Act and our
24 draft programmatic EIS that has just been issued, and
25 is open for public comment.

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1 The Energy Policy Act was signed by the
2 President on August 8, 2005. In that huge document,
3 there are 23 separate provisions associated with
4 offshore resource management, including alternative
5 energy and alternate use.

6 Well, what does the Energy Policy Act do
7 for alternative energy and alternate use for the
8 Department of the Interior? Basically, Section 388 of
9 EPAAct amended the Outer Continental Shelf Lands Act
10 and gave the Secretary of the Interior the lead agency
11 responsibility for moving forward on renewable energy,
12 or as we call it alternative energy and alternate uses
13 on the outer continental shelf.

14 DOI then, in turn, designated the Minerals
15 Management Service to go ahead and implement and
16 create a program. So MMS' tasks under EPAAct are to
17 develop a regulatory regime that considers and ensures
18 consultation with affected states, and of the
19 stakeholders of the federal agencies. We have the
20 discretion to grant leases, easements, or other access
21 means, like rights of way, onto the OCS for these
22 types of projects.

23 We will develop a regulatory regime that
24 ensures enforcement with plans, compliance and
25 conditions. We will require federal financial

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1 security, bonding to make sure that folks that are
2 operating on the OCS are bonded, as well as provide a
3 fair return to the nation for use of our public
4 resources. That will be in the form of payments,
5 rentals.

6 It is also important to understand what
7 the EPAct did not do, what we don't have jurisdiction
8 for. Our new authority does not supersede or modify
9 existing federal authority. For example, for liquid
10 natural gas ports, that is still executed by the
11 Maritime Administration and Coast Guard. They still
12 have to permit those things. That is not new. We did
13 not receive that type of authorization.

14 As well, other federal statutory
15 compliance issues, for instance, NEPA, Endangered
16 Species Act, Clean Air/Clean Water Act -- our new
17 projects and authorities under Section 388 or Section
18 8P under the Outer Continental Shelf Lands Act must
19 adhere to those federal statutes. There are no
20 exemptions.

21 As well, our new authority does not apply
22 to areas designated as national reed sanctuaries,
23 national parks, national wildlife refuges, or any
24 national monuments. And as well, we do not have
25 authority over any kind of OTEC -- ocean thermal

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1 energy projects. I believe that's NOAA.

2 So why are we here today? We're here
3 today to talk about the proposed action, which is the
4 establishment of an alternative energy and alternate
5 use program, and how that is evaluated and analyzed in
6 a programmatic EIS.

7 So just to give you some examples of what
8 we consider as alternative energy, it would be wind
9 energy, wave, ocean current, offshore solar energy, as
10 well as hydrogen generation. Just to give you a sense
11 of what some of these machines look like, this is
12 classic wind technology that's employed or deployed
13 offshore Europe, to give you a sense of the size and
14 the evolution of these ultra-wind turbines. And we'll
15 take a look mainly at 3.6s, that's what I believe Cape
16 Wind is proposing in Nantucket Sound.

17 Typically, these wind farms are laid in
18 this type of fashion, although it could be something
19 else. But again, to give you a flavor of the types of
20 scenarios that the EIS took a look at, as well as
21 ocean wave technology, their point absorbers in this
22 side, and attenuators, the gap of the energy from the
23 waves.

24 There's also ocean current technology
25 that's being deployed. And those are almost like

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1 under or submerged water turbines that gather the
2 energy from currents.

3 Examples of alternate use. Alternate use
4 will be taking a look at previously or future
5 permitted structures under the OCS Lands Act, and
6 using them in a different fashion perhaps for
7 aquaculture, research, education, recreation, offshore
8 oil and gas support, and telecommunications. The
9 caveat there is that if any of these activities are
10 already authorized by another statute, then they
11 won't be considered an alternate use activity under
12 Section 388 or Section 8P of the OCS Lands Act.

13 So there's some challenges in developing
14 this program. And the main one is the changing nature
15 of the technology and of the industry. It's a rapidly
16 evolving technology. It's basically unproven in U.S.
17 waters, although wind farms have been sited offshore
18 Europe. It's a nascent industry. It's an emerging
19 industry. And there's uncertain viability associated
20 with that.

21 So as a first step, we decide to get a
22 good understanding of what the general interface is
23 between these technologies and the offshore marine
24 environment. So we decided to do a programmatic EIS.

25 Classically, you prepare programmatic EISs

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1 to first and foremost involve the public early in
2 identifying issues of concern. And that's
3 particularly important here because we don't have
4 experience in this nation of deploying these types of
5 technologies in the marine environment. So it's very,
6 very important to get this kind of input.

7 We also do programmatic EISs to address
8 implementation of a new federal program -- this is
9 really good for us because we haven't developed a new
10 federal program in a long time here at the Minerals
11 Management Service -- as well as to identify generic
12 impacts of alternate use of existing facilities.

13 People have always talked about using
14 these previously permitted OCS allay facilities, but
15 now we get a chance to take a look at what does that
16 mean.

17 It also offers us an opportunity to
18 recommend mitigation measures on a general broad
19 level, as well as inform the decision maker of the
20 environmental consequences of implementing a program.
21 Again, this is a broadcast. It's not a site-specific,
22 or project-specific or technology-specific analysis.
23 It is a broad evaluation of these technologies in the
24 marine environment.

25 So basically, our particular programmatic

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1 EIS is taking a look at the purpose and need. And
2 that purpose is the evaluation of a federal program in
3 the outer continental shelf for alternative energy and
4 alternate use.

5 We're taking a look at mitigation and
6 impacts -- impacts coming from siting, from
7 construction, and mitigation -- common sense
8 mitigation. For instance, if you can really site
9 something well, and understand and evaluate the
10 environmental impacts associated with the siting,
11 maybe you can avoid some hazards or other issues.
12 That in of itself is a good solid mitigation to begin
13 with, as well as the EIS looking at alternatives to
14 the proposed program.

15 You have, of course, the no action
16 alternative. If we do not develop a program, we do
17 nothing. There is no development, no permitting for
18 alternative energy and alternate use.

19 One of the alternatives is to take a look
20 at dealing with it on a case-by-case basis. Again, do
21 not issue regulations, just basically receive
22 proposals and evaluate them on a case-by-case basis.
23 There's no template perhaps for mitigation or for a
24 lease template. You just deal with it on a case-by-
25 case basis. And of course, the proposed action is to

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1 take a look at it from the perspective of coming up
2 with an organized predictable program and process for
3 evaluating and providing access to these activities.

4 We're taking a look at short- and long-
5 term impacts, again on a very global broadcast. Those
6 sorts of issues will be further defined when you get
7 to a region or a site-specific EIS. And it also
8 describes how public concerns are dealt with with
9 regard to the scoping hearings that we held around the
10 nation.

11 So the scope of our EIS. Basically our
12 time frame is taking a look at the next five to seven
13 years. And that's an acknowledgement over the rapidly
14 evolving technology. It's very difficult to take a
15 look into a crystal ball and see what may happen in 15
16 years, because we're very ingenious as human beings,
17 and who knows what kind of technology will be adapted
18 or created.

19 So, we're taking a look at the next five
20 to seven years for this program -- programmatic EIS.
21 The technologies that we're evaluating in our draft
22 PEIS are wind, wave, and ocean current, because we
23 believe in the next five to seven years, those will be
24 the technologies and the uses that will be employed.

25 As well as for the geographic location for

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1 our scope, we're taking a look at the East Coast, the
2 West Coast, and the Gulf Coast. You'll see that
3 Hawaii and Alaska are not on here. Hawaii is not on
4 here because of the way that the slope drops off very
5 quickly. And so most of the types of technology will
6 be in deeper water than we believe will be deployed in
7 the next five to seven years. As well as Alaska's not
8 on here, as well. We scoped that out. And that's a
9 belief that the technology there in the harsh
10 environment -- we're probably not going to see
11 projects in the federal OCS during this five- to
12 seven-year time frame. More than likely you'll
13 probably see state projects.

14 But that does not mean that if there were
15 a project that came on the federal OCS in Alaska and
16 Hawaii that we would not take a look at them. They
17 would be subject to their site-specific NEPA
18 documentation, and of course, whatever regulations and
19 technical and environmental reviews that MMS would
20 require. So just for the programmatic EIS, we took a
21 look at what was reasonably likely to occur in the
22 next five to seven years.

23 And again, the other dilemma there is
24 federal waters. We have to look at our jurisdiction.
25 And that's basically three nautical miles from shore,

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1 as well as we do not cover the Great Lakes. So if
2 something were to go into the Great Lakes, that would
3 not be a Minerals Management Service Section 388
4 permitted activity.

5 So the types of activities or phases
6 analyzed for wind, wave and ocean current are site
7 characterization. What kinds of activities are
8 associated with putting a Met Tower out, with
9 anchoring one of these point source absorbers, or one
10 of these attenuators.

11 Technology testing -- to put something out
12 there perhaps not to plug into the grid, but just to
13 test this technology. That's an activity that we
14 evaluated in the programmatic EIS to understand the
15 general interfaces of the marine environment.

16 Construction and installation activities
17 -- and we're finding that that's probably where we'll
18 see the most impacts to the marine environment.

19 And operation, as well as decommissioning
20 -- the removal of those facilities once electrical
21 generation is completed. And then we also identified
22 mitigation measures.

23 I'm not going to go through this slide,
24 but it gives you kind of the sense of the breadth of
25 resources that we analyzed, things that people are

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1 familiar with -- air quality, marine military uses of
2 the area, other uses of the area. Marine coastal
3 birds -- a key issue when it comes to offshore
4 renewable energy permitting, fish resources and
5 essential fish habitats, sea turtles. But it gives
6 you a sense of what is in the programmatic EIS -- the
7 resources that we analyzed.

8 So what are we looking for today? Well,
9 we are most importantly looking for your comments.
10 Again, this is really a new and emerging technology --
11 a new and emerging program. We don't have
12 preconceived notions. This is, like I said, new, new,
13 new. So we really truly need to have you take a look
14 at the draft programmatic EIS from this broad scope,
15 and give us your input and your comments.

16 We want to understand the issues of
17 concern for federal agencies, your trust resources and
18 the things that you perhaps have had experiences with
19 with regard to energy development in the marine
20 environment. We need to understand those things.

21 Also we want input on potential areas of
22 interest -- type of technology, timing, if you're
23 aware of because of the work that you do or some new
24 technology coming on line that could be placed in the
25 federal OCS that would be under Section 388. We want

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1 to hear that, and hear what your concerns are.

2 If you know of any monitoring or
3 mitigation measures. We do know that there's a very
4 robust onshore wind program that the Bureau of Land
5 Management does on federal lands, as well as there's
6 a lot of private land owners that are permitting this
7 type of construction on their property.

8 If you're aware of any mitigation that's
9 come through from one of those onshore projects that
10 may have applicability in the offshore environment, we
11 want to hear that. And we want to receive information
12 on identification of environmental and predictive
13 information -- modeling.

14 What about scouring? If anybody does any
15 kind of scouring models, or any kind of physical and
16 oceanographic modeling that can help us understand
17 what the implications could be with regard to siting,
18 constructing and offering one of these facilities on
19 the outer continental shelf, we want that input.

20 This, I think, presents a unique
21 opportunity to provide input to the federal government
22 on this. This is new. Again, there's no preconceived
23 notion. We truly are embracing any kind of comment
24 that we receive. It has to be constructive though.

25 So what is our goal? The draft EIS was

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1 issued and published on March 16th. This is our first
2 public hearing, as John has said already. We're
3 moving on to New Jersey, Massachusetts, New York.
4 We'll be on the West Coast in Oregon and in
5 California, as well as in the south in Texas and
6 Florida and in South Carolina.

7 Our public comment period closes on the
8 21st of May. We're planning to publish the final
9 programmatic EIS in August of '07, and coming out with
10 the record cessation about a month later. So we're
11 truly trying to move forward with this broad general
12 look at what the implications could be associated with
13 these types of technologies in the marine environment.

14 So how do you comment? Obviously I know
15 you've all signed up to be speakers, so you'll be
16 commenting orally at this hearing.

17 As well, you can take a look at the
18 website. That's OCSEnergy.ANL.gov, and submit
19 comments via the website or in writing. And the
20 address is up there.

21 And again, I know there's sheet up at the
22 front that if you need any of this information, you
23 can go back to the registration desk and they can give
24 it to you.

25 So what I would like to do now is turn the

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1 meeting back over to John so we can hear oral
2 comments. And John can kind of give you an idea of
3 what the rules of order are after this presentation.

4 But thank you very much for coming. And
5 I look forward to hearing your comments.

6 MR. GASPER: Thanks, Maureen.

7 At this time I'd like to ask the MMS panel
8 to take their place on the stage.

9 And now we begin the part of the hearing
10 today that's really yours. This is your opportunity
11 to make your thoughts known on the programmatic EIS
12 that was published about a month ago.

13 MMS is very interested in hearing public
14 comments. In a lot of cases you folks are engaged in
15 either the geographical location, or maybe some of the
16 technologies or have other familiarity with issues
17 that we don't. And it's very important to us that you
18 make those views known.

19 We've engaged a court reporter here today
20 to make sure that your comments are recorded as you
21 give them, and that they're a part of the permanent
22 record. Those will be used as input when we finalize
23 the programmatic EIS.

24 So we're grateful you came today, and are
25 very interested in hearing what you have to say about

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1 that programmatic EIS.

2 As Mo mentioned, there are a couple of
3 ways you can comment here today. The first is via
4 written comments. When you came in and registered,
5 you had the opportunity to pick up a comment form. If
6 you didn't do that, they'll be available at the desk
7 when you leave.

8 Just fill out your comments on that form.
9 Fold it. Mail it in to the address that's on the
10 back. If you have any other comments you'd like to
11 send along or supporting materials, feel free to do
12 that.

13 In addition, if you want to just submit
14 your written comments to any of those of us here today
15 that have a name tag who are supporting the
16 Alternative Energy and Alternate Use Program, we'll
17 make sure that your comments get recorded and used as
18 input to the final EIS.

19 In addition, you have the opportunity to
20 comment orally here today. We ask that if you want to
21 make an oral comment and you haven't already, please
22 go sign up at the registration desk. They'll register
23 you and put you in line to speak. Speakers will be
24 called up to make their comments in the order in which
25 they registered.

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1 We ask that when you do come up, you
2 please state your name, and your affiliation so that
3 the court reporter can accurately record who you are.
4 And then go ahead and make your statement.

5 Initially we're asking that you keep those
6 comments to three minutes so that everybody will have
7 a chance to speak. Clearly if you need more time, I
8 think we'll have plenty of time here today for you to
9 speak. But at least initially, let's keep it to three
10 minutes. And then after everyone's had a chance to
11 speak, if you'd like to elaborate, you'll have that
12 opportunity.

13 So at this point in time, I think I'd like
14 to call the first speaker. The first registered
15 speaker is Sandra Young from the Alliance to Protect
16 Nantucket Sound.

17 MS. YOUNG: Good morning. My name is
18 Sandra Young, and on behalf of the Alliance to Protect
19 Nantucket Sound, I thank you for the opportunity to
20 comment.

21 Since 2002, the Alliance has been calling
22 for an OCS-wide renewable energy program based on a
23 programmatic environmental impact statement, which
24 could inform regulations and help manage the OCS
25 resource as a whole.

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1 The Alliance supported legislation on the
2 matter. We provided detailed comments in response to
3 the Minerals Management Service's Advance Notice of
4 Proposed Rulemaking. And we provided both testimony
5 and written comments regarding the scope of the PEIS.

6 We wholeheartedly agree with the draft
7 PEIS evaluation that having programmatic regulations
8 is better than not having them. We are concerned,
9 however, that this was the extent of the evaluation
10 MMS conducted.

11 The draft PEIS focuses on whether or not
12 there should be any national regulations. But the
13 relevant NEPA question is not what is the impact of
14 having any national regulations, rather MMS is tasked
15 with assessing the environmental impacts of the
16 specific regulations that are being proposed by the
17 agency. Because the draft PEIS fails to address the
18 impact of the specific national regulations, either
19 the PEIS must be redone, or a second PEIS will be
20 required to address the draft regs when they're
21 published.

22 We're also concerned that the level of
23 deference given to the industry in the development of
24 the draft PEIS. As we stated in our scoping comments,
25 federal agencies have a duty to look out for the best

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1 interests of the environment and to be the
2 counterweight that prevents private interests from
3 exploiting federal resources to the detriment of the
4 public trust.

5 The draft PEIS has failed to meet that
6 public trust obligation. Instead, the scope of the
7 review is dictated by current industry objectives. It
8 defers comment on issues like cumulative impacts, and
9 the development of exclusion zones until industry has
10 decided where and how it would like to proceed. The
11 deference that MMS has given to industry is not only
12 a violation of public trust, it also undermines the
13 purpose of programmatic regulations.

14 One of the main advantages of having a
15 programmatic structure is that it allows resource
16 management to be strategic and not just reactive. But
17 by sidestepping important OCS-wide issues, and by
18 allowing industry action to dictate when and how
19 resources will be assessed and managed, MMS removes
20 all ability for proactive and strategic management of
21 the OCS resources.

22 The programmatic regulations, and by extension,
23 the programmatic EIS should be addressing OCS-wide
24 issues directly, and not sidestepping them.

25 I refer you to the Alliance's comments of

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1 May 2006 on the scope of the PEIS and to our comments
2 in response to the Advance Notice of Proposed
3 Rulemaking submitted on February 22, 2006, and again
4 encourage you to address issues which can inform the
5 development of specific national regulations.

6 Thank you again.

7 MR. GASPER: Thank you. Our next speaker
8 is Max Chamovits from OREC.

9 MR. CHAMOVITS: Good morning. I'm Max
10 Chamovits speaking on behalf of the Ocean Renewable
11 Energy Coalition.

12 Thanks for all the hard work you have done
13 at MMS and for establishing a dialogue with the
14 industry as you establish rules that will more than
15 likely govern this industry for some time.

16 First, we are glad to see that MMS has
17 included wave technologies along with offshore wind in
18 its five-year planning cycle. Wave, as well as other
19 ocean technologies, are advancing at a rapid clip with
20 projects ready for testing and deployment. These
21 technologies, for the most part, are being promoted by
22 small companies that do not have the resources to
23 undergo and survive a five-year long permitting
24 process. We urge an expeditious licensing process
25 with exemptions for test facilities as stated in our

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1 comments in the MMS and OPR proceeding.

2 Moreover, the congressional deadline has
3 passed for issuing rules governing the licensing of
4 projects on the OCS. We encourage MMS to issue rules
5 expeditiously and resolve all jurisdictional problems
6 with FERC.

7 Lastly, we would like to remind you that
8 advances in technologies, even energy-related
9 technologies, are happening faster than they used to,
10 and the three-year, five-year, and seven-year planning
11 cycles should be sensitive to new and emerging
12 technologies that might not even be on our radar
13 screen today.

14 Thank you again for your hard work.

15 MR. GASPER: Thank you. Our next speaker
16 -- Zach Corrigan for Food and Water Watch.

17 MR. CORRIGAN: Good morning. Thanks for
18 allowing me to comment today.

19 My name is Zach Corrigan and I'm the staff
20 attorney for Food and Water Watch, a national non-
21 profit consumer organization that fights against
22 corporate abuse of our food supply and fresh and ocean
23 water resources. We will submit comprehensive written
24 comments for the record at a later date.

25 Statements in MMS' PEIS lead one to

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1 conclude the Agency is planning to issue proposed
2 rules that a) establish the first national program for
3 the permitting and regulating of fish farming, or
4 aquaculture, in federal waters, and b) that allow
5 energy companies to abandon old unused platforms at
6 sea instead of requiring companies to remove them as
7 currently mandated by federal law. We object to these
8 plans and think they are outside the Agency's
9 authority under the Energy Act of 2005. Our comments
10 today are addressed both at these proposals as well as
11 the Agency's flawed PEIS.

12 First, as a preliminary matter, we object
13 to the MMS taking public comment on its PEIS before
14 the Agency has issued proposed rules. Without
15 proposed rules, the PEIS does not adequately describe
16 the proposed program and this severely hinders our
17 ability to fully assess the program's environmental
18 impacts. We request that the Agency either issue a
19 supplemental PEIS after it issues proposed rules, or
20 reopen the PEIS comment period on this PEIS.

21 Second, MMS should drop its apparent plans
22 to permit and regulate marine fish farming in federal
23 waters. Fish farming involves the raising of
24 carnivorous fin fish and often large caged cages
25 where fish waste and chemicals flush straight into the

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1 open ocean.

2 The 2005 Energy Act limits the Agency's
3 power to regulate authorized marine-related uses or
4 activities, that is activities specifically authorized
5 by Congress. Congress has not specifically authorized
6 offshore aquaculture. MMS should not use this
7 rulemaking to bypass Congress and allow commercial
8 fish farms for the first time in federal waters.

9 Third, the PEIS is inadequate because the
10 Agency fails to assess the likely impacts related to
11 permanent ultra-aquaculture facilities on energy
12 platforms. Most glaring is MMS' failure to assess the
13 cumulative impacts of ultra-aquaculture, which the
14 Agency says are unknown at this time. This is not an
15 excuse. NEPA requires the Agency to assess all
16 reasonable foreseeable effects.

17 Fourth, nothing in the 2005 Energy Act
18 gives MMS authority to create a federal rig-
19 abandonment program by overturning current federal law
20 that generally requires energy companies to remove
21 their platforms after they cease energy production.

22 Further, it is simply inappropriate to
23 allow energy companies to turn our oceans into their
24 own private dumping grounds in order to save the
25 industry \$9 billion in removal costs, estimated

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1 through 2020.

2 Finally, the PEIS is inadequate because it
3 fails to assess the likely negative impacts related to
4 allowing rigs to be abandoned at sea. Among other
5 issues, the PEIS fail to assess the long-term affects
6 of rig abandonment, such as how abandoned rigs can
7 make the mercury and old discarded drilling wastes
8 that exist in surrounding sediments more biologically
9 available for uptake by marine organisms, exposing
10 fish populations and threatening public health.

11 We urge the Agency to address these
12 impacts and take these comments seriously as it moves
13 forward on its rulemaking.

14 MR. GASPER: Thank you.

15 That brings us to the end of the speakers
16 who registered. Is there anybody else in the audience
17 who'd like to offer comments today?

18 If not, then I declare this hearing
19 closed. Thanks for coming.

20 (Whereupon, at 10:32 a.m., the hearing was
21 adjourned.)

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